

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
UNITED STATES OF AMERICA      )  
                                        )  
                                        )  
                                       )      Criminal No. 16-10094-LTS  
v.                                    )  
                                        )  
ROSS MCLELLAN,                    )  
                                      )  
Defendant.                        )  
\_\_\_\_\_

**GOVERNMENT'S CORRECTED WITNESS LIST**

The United States respectfully submits the following corrected list of potential witnesses to the Court in advance of the June 4, 2018 trial. The government reserves the right to supplement this list with reasonable notice to the defendant, or to call additional rebuttal witnesses not identified here.

Respectfully submitted,

SANDRA MOSER  
Acting Chief, Fraud Section  
Criminal Division

By: /s/ William E. Johnston  
WILLIAM E. JOHNSTON  
Trial Attorney

ANDREW E. LELLING  
United States Attorney

By: /s/ Stephen E. Frank  
STEPHEN E. FRANK  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I certify that on May 28, 2018, this document was filed through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ Stephen E. Frank  
STEPHEN E. FRANK

CASE NAME: UNITED STATES OF AMERICA V. ROSS MCLELLAN	AS OF: May 28, 2018
<b>CRIMINAL CASE NO. 16-10094-LTS</b>	
<b><u>GOVERNMENT'S WITNESS LIST</u></b>	

## CASE IN CHIEF WITNESSES

WITNESSES	LOCATION
Boomgaardt, Richard	Sevenoaks, England
Buckley, Killian	Dublin, Ireland
Clemmenson, Thomas	Hartford, CT
Dionisio, Joseph	Boston, MA
Dixon, Graham	London, England
Finocchi, Stephen	Boston, MA
Ghiozzi, Greg T.	United States Postal Inspection Service, White Plains, NY
Haerden, Roul	Amsterdam, Netherlands
Joenk, Steven	New York, NY
Johnson, Dean	London, England
Kelly, James	New York, NY
McGillicuddy, Michael J.	Federal Bureau of Investigation, Washington, DC
McKnight, Ian	London, England
Minahan, John	Boston, MA
Morris, Kristen	Boston, MA
O'Callaghan, Eugene	Dublin, Ireland
Paolo, Joseph	New York, NY
Pennings, Edward	Cobham, England
Shaw, Scott	Boston, MA
Trombly, Garett	Federal Bureau of Investigation, Boston
Walsh, Brian	New York, NY
Keeper of Records for State Street Corp.	